

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

MANDRELL ROLLE

*Defendant(s)*

Case No.

23-6001-Hunt

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 3, 2023 in the county of Broward in the  
Southern District of Florida, the defendant(s) violated:

*Code Section*  
 Title 18, United States Code,  
 Section 922(o)

*Offense Description*  
 Possession/Transfer of a Machine Gun

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.*Complainant's signature*

ATF SA Justin Herzlich  
*Printed name and title*

Sworn to before me and signed in my presence.

Date: 01/04/2023*Judge's signature*City and state: Fort Lauderdale, Florida

Patrick M. Hunt, United States Magistrate Judge  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

Your affiant, Justin Herzlich, being duly sworn, deposes and states:

**INTRODUCTION AND OFFICER BACKGROUND**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") and have been so employed since approximately 2007. Some of my responsibilities include investigating violations of federal law, including the Gun Control Act. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that, I am empowered by law to conduct investigations of, and make arrests for, offenses enumerated in Title 18 of the United States Code.

2. Your affiant makes this Affidavit in order to establish probable cause to believe that on or about January 3, 2023, in the Southern District of Florida, Mandrell Rolle Jr. ("ROLLE"), did knowingly possess a machinegun, as defined in Title 26, United States Code, Section 5845 in that the defendant possessed a Glock switch device that allows a conventional semi-automatic Glock pistol to function as a fully automatic firearm and shoot automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Section 922(0).

3. The statements contained in this Affidavit are based on my personal knowledge, as well as information provided by other individuals, including other law enforcement officials and my review of records and other evidence obtained during the course of this investigation. I have included only those facts that I believe are necessary to establish probable cause in support of an arrest warrant.

**PROBABLE CAUSE**

**Undercover purchase of Five (5) Machineguns from ROLLE**

4. Between the dates of November 23, 2022, and January 3, 2023, an ATF Agent acting in an undercover capacity ("UC") purchased multiple machineguns from ROLLE. On January 3, 2023, the UC purchased (5) Machineguns from ROLLE in exchange for two thousand two hundred and fifty dollars (\$2,250.00). The machineguns that ROLLE was in possession of are Glock conversion devices commonly referred to as a "Glock Switch" or "Glock Auto Sear." The "Glock Switch" and "Glock Auto Sear" is a part, or combination or parts, designed and intended for use in converting a semi-automatic pistol into machinegun.

5. On January 3, 2023, the UC met with ROLLE in the Home Depot parking lot, located at 5801 South University Drive, Davie, Florida in order to purchase five (5) machineguns. Law enforcement surveilled ROLLE exiting his residence in Pembroke Pines, Florida and travel to the Home Depot riding a dirt bike. ROLLE parked his dirt bike along the passenger side of the UC vehicle and entered the front passenger seat.

6. Upon entering the UC's vehicle, ROLLE provided the UC with five (5) clear plastic bags containing fully assembled Glock conversion devices, machine guns, in exchange for \$2,250.00 in ATF funds. At the conclusion of the sale, the take down signal was given. Upon observing law enforcement agents approaching, ROLLE immediately exited the vehicle and fled on foot. ROLLE was taken into custody after a brief pursuit. The meeting was video and audio recorded.

7. Search incident to arrest, ROLLE was found to be in possession of a Glock Model 19 Gen5, 9-millimeter semi-automatic pistol, containing thirty-three rounds (33) of 9-millimeter ammunition in an extended magazine. This firearm was located in a holster on ROLLE's front waistband. ROLLE attempted to cooperate with law enforcement and advised that he ordered the

Glock switches online and that they were transported to the United States from China. ROLLE also provided consent to search his cellular telephone in which law enforcement observed multiple videos showing individuals firing handguns which had been modified to fire with a Glock conversion device attached. Law enforcement also observed conversations between ROLLE and unknown individuals showing pictures and videos of various type of firearms and discussing the sale of firearms and Glock conversion devices.

8. Prior to the above meeting and transaction, the UC met with ROLLE on three (3) separate occasions to purchase a total of nine (9) machineguns<sup>1</sup>. During at least one of these meetings, ROLLE advised the UC that the other switches ROLLE had ordered were in the mail and were still “processing.” ROLLE advised that the switches were shipped via the mail from New York and his friend monitors the tracking of the shipment, but it moves slowly. ROLLE then explained to the UC how to put together a switch that was broken down into three pieces. ROLLE told the UC that he has used the switches before, specifically on one of his own firearms. ROLLE went on to detail that the UC would need to file down the “pin” part of the switch. The UC agent knows from training and experience that sharpening the “blade” or “bar” of the switch, would allow the switch to function more smoothly when firing fully automatic. ROLLE stated he would notify the UC as soon as the other switches arrived,

9. During another meeting, the UC asked ROLLE if he was having issues with the switch malfunctioning after firing the firearm fully automatic. ROLLE stated that he did not have any problems after shaving down a small spot on the Glock switch to make it function smoother. ROLLE continued to say that he usually only shoots “half,” referring to half a magazine, because he doesn’t live in an area where he can shoot a gun without getting in trouble.

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<sup>1</sup> Including the January 3, 2023 meeting, ROLLE sold law enforcement fourteen (14) Glock switches.

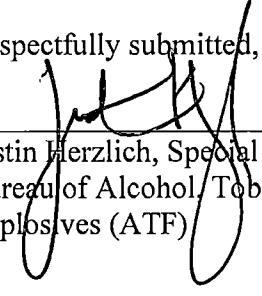
The UC asked ROLLE if Glock switches were something he could get in trouble for. ROLLE replied that the Glock switches are “fully auto” switches, meaning the switches made a firearm function as a machine gun, evidencing that ROLLE knew precisely what the Glock switches were. ROLLE told the UC to drive carefully when he was in possession of the switches so he doesn’t get pulled over because the switches are illegal. ROLLE even stated that the switches will get “Fed” time, evidencing that ROLLE knew the switches were prohibited federally, and you could be sentenced to Federal prison for possessing them. ROLLE even provided an example of why law enforcement was concerned about the Glock switches. These prior meetings were audio and video recorded.

10. Your affiant further consulted with an ATF Agent, who has been previously qualified as an expert in the identification of firearms. The expert examined the above-described machine guns purchased from ROLLE on January 3, 2023, and found them to have identical characteristics of machineguns that have been previously test-fired by ATF.

11. For the abovementioned reasons, your affiant submits there is probable cause to believe that on or about January 3, 2023, in the Southern District of Florida, Mandrell Rolle Jr. (“ROLLE”) did knowingly possess a machinegun, as defined in Title 26, United States Code, Section 5845(17) and Title 18, United State Code, Section 921(a)(23), in that the defendant possessed a Glock switch device that allows a conventional semi-automatic Glock pistol to function as a fully automatic firearm and shoot automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Section 922(0).

**FURTHER YOUR AFFIANT SAYETH NAUGHT.**

Respectfully submitted,



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Justin Herzlich, Special Agent  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives (ATF)

Attested to by the applicant in accordance with  
the requirements of Fed. R. Crim. P. 4.1  
on this 4<sup>TH</sup> day of January, 2023, at  
Fort Lauderdale, Florida

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PATRICK M. HUNT  
UNITED STATES MAGISTRATE JUDGE